

# **Exhibit 2**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

LTL MANAGEMENT LLC,

Plaintiff,

v.

DR. THERESA SWAIN EMORY, DR.  
RICHARD LAWRENCE KRADIN, AND DR.  
JOHN COULTER MADDOX

Defendants.

DOCKET NO.: 3:23-CV-03649-MAS-RLS

CIVIL ACTION

**DECLARATION OF DR. RICHARD L. KRADIN, MD**

Dr. Richard L. Kradin, MD hereby declares under penalty of perjury as follows:

1. I am over eighteen (18) years of age and have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.

2. I previously submitted a declaration dated September 12, 2023, where I stated that to my knowledge I had never served as an expert witness in any case filed in any state or federal court in New Jersey. I made that statement based on my recollection that I have never traveled to New Jersey to testify in any deposition or trial.

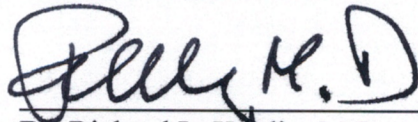
3. I understand that LTL has submitted various exhibits in connection with their Opposition to Defendants' Motion to Dismiss, which indicate that I submitted reports in connection with *Teuscher v. Brenntag North America, Inc., et al.*, No. MID-L-7249-16AS (N.J. Super. Ct), *see* ECF No. 19-9, and *Provinzano v. Cyprus AMAX Minerals Company, et al.*, No. MID-L-002464-17AS (N.J. Super. Ct.), *see* ECF No. 19-10. I understand that I was deposed in Boston, Massachusetts in connection with those cases. *See* ECF No. 19-11.

4. I also understand that LTL submitted Exhibit K to the Declaration of Peter C. Harvey, *see* ECF No. 19-12, to support their claim that I was disclosed as an expert in the cases

listed in Exhibit K. I have reviewed the list of cases in Exhibit K and confirmed that, in addition to the cases listed above, I only submitted expert reports in *Alderdice; et al. v. Revlon, Inc.; et al.*, No. MID-L-0546-17AS (N.J. Super. Ct.) and *Macy v. Brenntag North America, Inc.; et al.*, No. MID-L-00623-17AS (N.J. Super. Ct.). I did not testify in any deposition or trial in connection with these cases.

5. When I am asked to prepare an expert report like those submitted at ECF Nos. 19-9 and 19-10, the plaintiff's residence and the jurisdiction in which their case is located has no bearing on whether I take their particular case.

Executed on October 9, 2023.



Dr. Richard L. Kradin, M.D.